

Juan E. Morgan, pro se
Casa # 77
Fort Clayton
Panama City, Panama
011-507-6673-4827

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MAY 7 2007

CHAMBERS OF
JUDGE LAMBERTH

*VIA EXPRESS
mail 12:05 pm*

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

JUAN E. MORGAN
Casa # 77
Fort Clayton
Panama City, Panama
Plaintiff,

Case No. 05-989 (RCL)

v.

MIKE JOHANNIS, SECRETARY,
UNITED STATES DEPARTMENT OF
AGRICULTURE
1400 Independence Avenue, S.W.
Washington, DC 20250-1400

Defendant.

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NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

PLAINTIFF PRO-SE'S CONSENT MOTION TO AMEND THE
SCHEDULING ORDER EXTENDING DISCOVERY THROUGH
JULY 31, 2007

Pursuant to Federal Rules of Civil Procedure §6(b) plaintiff Juan Morgan, pro se, respectfully moves for an extension of the discovery deadline in this matter. I am informed that the defendant's attorney has consented to a 60 day extension of this deadline. I am proceeding pro-se in

this action but have been seeking local counsel so that the attorney who represented me within the Department, can take over this matter.

I have now responded to the defendant's discovery demands and interrogatories and my deposition will be taken in June. The schedule in this matter has been frequently interrupted as I am ill and am frequently hospitalized and thus, unavailable to deal with this case.

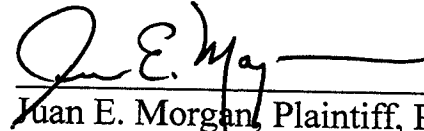
In addition to my deposition, in my reply to the defendant's document demand I also sought some documents. I will need to take some depositions of non-party witnesses who live substantial distances from this Court and thus, cannot be produced at trial. I also understand that several of the defendant's employees who would have knowledge of the facts are retired and therefore may be difficult to bring to court. Between my hospitalizations and the logistics involved, I had suggested to the defendant's attorney that a further extension is needed and she had no objection. Indeed my deposition had to be put off for several weeks as I am going to be subjected to several medical tests, which will go on for several weeks.

Therefore, I respectfully request, with the consent of the defendant's

attorney, that this motion be granted and the discovery deadline be reset to July 31, 2007.

Respectfully submitted,

Dated, May 1, 2007
Panama City, Panama


Juan E. Morgan, Plaintiff, Pro Se
011-507-6673-4827

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UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

JUAN E. MORGAN
Casa # 77
Fort Clayton
Panama City, Panama
Plaintiff,

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1400 Independence Avenue, S.W.
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Defendant.

ORDER

Upon consideration of the plaintiff's consent motion to amend the Court's Scheduling Order and the entire record herein, it is this ____ day of _____, 2007

Ordered that the plaintiff's consent motion to amend the Scheduling Order is granted and it is

Further Ordered that the deadline for completion of discovery is EXTENDED through July 31, 2007, and further dispositive motions are

thereafter to be filed by September 1, 2007, replies by September 15.

So Ordered.

United States District Judge